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Attorneys for Defendants/Appellees
 United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

SAMSON TUG AND BARGE CO., INC., an) Civil No. A03-006 CV (JWS)
 Alaska Corporation)

Plaintiff/Appellant)

v.)

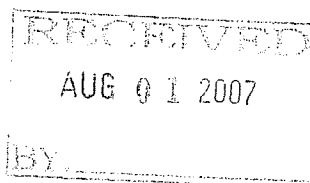
UNITED STATES OF AMERICA,)

acting by and through)

the UNITED STATES DEPARTMENT of the)
 NAVY MILITARY SEALIFT COMMAND,)
 and UNITED STATES DEPARTMENT OF)
 THE ARMY MILITARY TRAFFIC)

IN ADMIRALTY

RULE 30(B)(6) NOTICE OF
 EXAMINATION BEFORE TRIAL



Date 7-27-07 Exhibit # 111
 Case
 Deponent George Johnson
 Reporter SYNDIE HAGARDT
 Naegeli Reporting Corporation
 (800) 528-3335 FAX (503) 227-7100

Exhibit "A" - 9

1 MANAGEMENT COMMAND)

2 Defendants/Appellees)

3
4 PLEASE TAKE NOTICE that, pursuant to this Notice and Rule 30(b)(6) of the
5 Federal Rules of Civil Procedure, the United States of America will take the examination
6 before trial of Samson Tug and Barge Co. at the office of Naegeli Reporting Corporation,
7 601 Union Street, Suite 1624, Seattle, Washington 98101, phone (206) 622-3376, on Friday,
8 July 27, 2007 at 10:00 a.m.

9 Samson Tug and Barge Co. shall designate and produce for deposition such person(s)
10 as are competent to testify on behalf of the deponent regarding the matters set forth below
11 concerning the contract for the carriage of Government cargo to and from Adak, Samson's
12 operation, its claim and its prayer for fees:

13 1. The factual basis for your contention that a diversion of what you call "contract
14 cargo" in your complaint to some other carriage than Samson Tug and Barge actually
15 occurred;

16 2. The factual basis for your contention that a diversion of what you call "contract
17 cargo" in your complaint to carriage by air actually occurred;

18 3. The factual basis for your contention that the Government induced Samson to
19 bid on the subject contract by agreeing to ship "all military and military sponsored cargo"
20 with Samson Tug and Barge;

21 4. The factual basis for your claim to entitlement to attorney's fees and costs under
22 EAJA;


23 5. The amount of your claim for attorney's fees and costs, and the support for
24 each;

25 6. The factual basis for your contention that the denial of your claim was baseless.

1 Said examination will take place before a reporter authorized by law to administer
2 oaths, and will continue from day to day until completed.

3 Dated: June 29, 2007.

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11 JEANNE M. FRANKEN
12 Trial Attorney
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13 Attorneys for Defendants/Appellees
14 United States of America
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 29, 2007, I have served a copy of the foregoing
RULE 30(B)(6) NOTICE OF EXAMINATION BEFORE TRIAL by telefax and first-class
mail, postage prepaid, upon:

Harold G. Bailey, Jr.
GARVEY SCHUBERT BARER
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Samson Tug and Barge Company, Inc.


VERONICA GARNER